



EL DORADO AGRICULTURAL WATER QUALITY MANAGEMENT CORP

PROTECTING OUR PRECIOUS RESOURCE

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Sent via email: jhartman@waterboards.ca.gov

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Attention: Dr. Jelena Hartman

Re: Comments on the Draft Templates for Farm Evaluation, Nitrogen Management Plan,
Nitrogen Management Plan Summary and Sediment and Erosion Control Plan

Dear Dr. Hartman,

We appreciate this opportunity to comment on the reference documents which will be applicable to our members of the El Dorado County Subwatershed Coalition. Our organization is a member of the Sacramento Valley Water Quality Coalition which also represents our interests.

The El Dorado County Agricultural Water Quality Management Corporation represents 317 individual growers who manage the small farms and ranches that comprise our irrigated agricultural operations. The total area of the portions of the sub-watersheds that we represent is approximately 1.1 million acres with irrigated agricultural operations representing roughly 3,312 acres or 0.3% of this area.

While our operations are generally concentrated in seven distinct geographic agricultural districts, there are no areas where agriculture is truly the predominant land use. There are no identified DWR Bulletin 118 groundwater basins or sub-basins and there are no SWB Hydrogeologically Vulnerable areas or DPR Groundwater Protection Areas within our county.

Although we feel that we represent no threat to groundwater quality based on our fractured rock environment, we have reviewed the templates and provide the following general comments:

1. General.

- a. The templates are, in general, confusing, incomplete and the data requested does not appear useful.
- b. There are redundancies between the various forms in terms of parcel, cropping and member information that require duplicative effort. This imposes a burden on the farmers who must complete the forms and the coalitions that must monitor for completeness.
- c. There is no appeal process for subwatersheds where monitoring is infeasible due to hydrologic conditions. A low threat option needs to recognize those areas that present no risk to groundwater due to the lack of defined basins.

2. Farm Evaluation Template.

- a. The evaluation form assumes that everyone is on a well and there is no other source of farm water.
- b. Is the "total acreage" the acreage of the parcel(s) or only the irrigated acres? Please define the term "background levels" in terms of the potential to discharge sediment as it could differ from year to year.
- c. The farm crop lists are incomplete. Will the crop lists be able to be tailored by each of the coalitions for specific orders? Cropping varies from area to area in the valley and foothills.
- d. The farm map requires an indication of potential water discharge points. Are these potential discharges of irrigation water, stormwater or both? Isn't this a non-point source program?

3. Nitrogen Management Plan Template.

- a. The nitrogen plan worksheet is confusing. The template assumes that all crops use nitrogen applications annually and that carryover and inputs can be easily calculated.
- b. The summary report is not particularly meaningful especially for those areas where nitrogen is not routinely applied.
- c. Will coalitions be allowed to tailor these forms for their specific orders? Will members who do not apply nitrogen be required to submit these plans and reports?
- d. How will a CCA certify the operations that do not apply nitrogen?

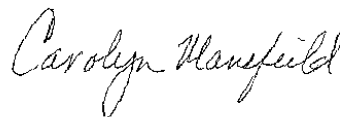
4. Sediment and Erosion Control Plan Template.

- a. The sediment and erosion control forms ask for information on acres with "potential discharge". Is this directed at irrigation runoff or stormwater runoff (discharges)?
- b. The template requests information on locations subject to frequent water flow events but does not define "frequent".
- c. The options for management of erosion are incomplete and will vary from area to area. Will coalitions be allowed to tailor these forms for specific orders?
- d. We support the ability for a member to include similar operations on one report instead of requiring redundant reports.

We appreciate the efforts of staff in considering our previous comments and recommendations for a management practices-based approach to preserving our excellent surface water quality while providing ground water quality protections. Our Pilot Program has proven to be effective and is specifically tailored to our cropping, soils and agricultural setting.

We would welcome the opportunity to work with Regional Board staff to develop criteria to allow us to continue such a program under the next order which recognizes the excellent stewardship of our family farms.

Sincerely,



Carolyn Mansfield, President

cc: Bruce Houdesheldt, Sacramento Valley Regional Water Quality Coalition
Pamela Creedon, Central Valley Regional Water Quality Control Board